

CALFRESH REQUEST FOR POLICY INTERPRETATION**PI# 18-14**

INSTRUCTIONS: Complete items 1 - 10 on the form. Use a separate form for each policy interpretation request. If additional space is needed, please use the second page. Retain a copy for your records and submit via email to CalFresh-PI@dss.ca.gov.

Please note: the policy interpretation provided is based on the unique set of facts presented and should not be assumed to apply in all scenarios.

1. RESPONSE NEEDED DUE TO: <input checked="" type="checkbox"/> Policy/Regulation Interpretation <input type="checkbox"/> QC <input type="checkbox"/> Other:		5. DATE OF REQUEST: 02/05/2018	NEED RESPONSE BY: 03/05/2018
2. REQUESTOR NAME:		6. COUNTY/ORGANIZATION: Lake County Department of Social Services	
3. PHONE NO.: EMAIL:		7. SUBJECT: VER 200 CIV, CW 2200, SAR 2	
4. REGULATION CITE(S): 20-006.543		8. REFERENCES: (Include ACL/ACIN, court cases, etc. in references) NOTE: All requests must have a regulation cite(s) and/or a reference(s). ACL 14-26 ACL 15-42	

9. QUESTION: (INCLUDE SCENARIO IF NEEDED FOR CLARITY):
1. Is the VER 200 CIV an acceptable verification request letter for active CalWORKs/CalFresh cases, or would a CW2200 still need to be sent to the household?
 2. Would the VER 200 be sufficient for informing household's of their IRT or would the SAR 2 still be required to be sent to the household?
 3. If a VER 200 CIV is sent to the household instead of a CW2200, and the household does not respond, should the case be discontinued for failure to provide?
 4. If the VER 200 is sent to the household mid-period requesting verification of income for a New Hire report, would this be considered soliciting verification that would become VUR?

10. REQUESTOR'S PROPOSED ANSWER:
1. The VER 200 is a stand alone form for IEVS purposes only. The CW 2200 is still the required verification request letter for CalWORKs and CalFresh.
 2. The SAR 2 would still be required to be sent to the household. The VER 200 does not meet the criteria outlined in ACL 14-26 for what would be a sufficient substitution to the CW 2200.
 3. For CalFresh only cases Per MPP Section 20-006.543 (b)(1) the household should be discontinued for failure to provide.
 4. Unsure. I am not sure if it is appropriate to request verification mid-period because a New Hire report was received by the county when it is not a mid-period reporting requirement for the CalWORKs and CalFresh Program to report a new job.

11. STATE POLICY RESPONSE (CFPB USE ONLY):
1. The State agrees with the proposed answer - per ACL 14-26, the CW 2200 is a required form and must be used when requesting verification of client information in the CalWORKs, CalFresh, and Medi-Cal programs, and outlines the consequences of refusing to provide verification.
 2. The State agrees with the proposed answer - per ACL 15-42, "The IRT must be provided to the CalFresh Household and CalWORKs AU using the SAR 2 form at approval of initial application and at any time the household/AU's IRT changes during the certification period, whether the household has an IRT or not."
 3. The State does not agree with the proposed answer - per ACL 12-25, "The CWD shall not take mid-period action based on third party information regarding changes that an AU/household is not required to report during the semi-annual period." Verification of information should only be requested from a household mid-period if the household was required to report the information. (Continued on page 2).

FOR CDSS USE

DATE RECEIVED: 2/7/2018	DATE RESPONDED TO COUNTY/ALJ: 12/13/2018 SM
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CALFRESH REQUEST FOR POLICY INTERPRETATION (Continued)**PI#18-14**

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3. (Continued) Since the VER200CIV form is not a required form for CalFresh households, the case should not be discontinued for failure to provide.

4. The State does not agree with the proposed answer - a New Hire report is not a mandatory mid-period reporting requirement. Please refer to ACL 12-25 and 12-25E for a list of mandatory mid-period reporting requirements. If a New Hire report is received, the CWD should document in the household's case file and follow-up at the next SAR 7 or recertification.

Information cannot become VUR. If the CWD needs to follow-up on information from a household, then by definition that information is not VUR. Please note that the State is in the process of issuing an ACIN on mid-period reporting that will provide additional clarifying information on this topic.